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*Attorneys for Defendants PLAYSTUDIOS, Inc.,
 Andrew Pascal, Edward King, Daniel Fетters,
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 Andrew Zobler, Sam Kennedy, Christopher Grove,
 William J. Hornbuckle, Joe Horowitz,
 Jason Krikorian, and Judy K. Mencher*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTIAN A. FELIPE, individually as
 administrator of the CHRISTIAN A. FELIPE
 CONTRIBUTORY IRA, and on Behalf of
 Similarly Situated Persons,

Plaintiff,

vs.

PLAYSTUDIOS, INC. *et al.*,

Defendants.

Case No.: 2:22-cv-01159-RFB-NJK

STIPULATION AND ~~(PROPOSED)~~ ORDER SETTING UNIFORM SCHEDULE FOR RESPONSES TO AMENDED COMPLAINT

(FIRST REQUEST)¹

¹ This request to set a uniform schedule for responding to the Amended Complaint is the first request for most defendants, but the second request as to the two defendants previously named.

1 Lead Plaintiffs The Phoenix Insurance Company Ltd. and The Phoenix Provident Pension
2 Fund Ltd. (“Lead Plaintiffs”) and defendants PLAYSTUDIOS, Inc. (the “Company”), Andrew
3 Pascal, Edward King, Daniel Feters, James Murren, Zach Leonsis, Brisa Carleton, Andrew
4 Zobler, Sam Kennedy, Christopher Grove, William J. Hornbuckle, Joe Horowitz, Jason
5 Krikorian, and Judy K. Mencher stipulate as follows:

6 WHEREAS, on April 5, 2022, a complaint against PLAYSTUDIOS and Andrew Pascal
7 was filed in the United States District Court for the Northern District of California alleging
8 securities laws claims on behalf of a putative class of stockholders (the “Action”);

9 WHEREAS, the Action is subject to the Private Securities Litigation Reform Act of 1995,
10 Pub. L. No. 104-67, 109 Stat. 737 (1995), which sets forth specialized procedures for the
11 administration of securities class actions, including appointment of a lead plaintiff, and approval
12 of its selection of lead counsel, to act on behalf of a purported class;

13 WHEREAS, on July 12, 2022, the Honorable Judge Vince Chhabria of the United States
14 District Court for the Northern District of California appointed Lead Plaintiffs and approved
15 Pomerantz LLP as lead counsel (ECF No. 44);

16 WHEREAS, on July 20, 2022, pursuant to the Parties’ stipulation, the Action was
17 transferred to this Court and assigned to the Honorable Judge Richard F. Boulware, II and
18 Magistrate Judge Nancy J. Koppe (ECF No. 49);

19 WHEREAS, by Order dated August 8, 2022, the date for Lead Plaintiffs to file an amended
20 complaint was set for October 4, 2022, and the date for PLAYSTUDIOS and Mr. Pascal to move,
21 answer, or otherwise respond was set for December 5, 2022; (ECF No. 71);

22 WHEREAS, on October 4, 2022, Lead Plaintiffs filed the Amended Complaint (ECF No.
23 73), which added twelve new individual defendants;

24 WHEREAS, pursuant to October 21, 2022 requests for waivers of service executed by the
25 newly named defendants, the new defendants have 60 days from the request for waiver of service
26 to move, answer or otherwise respond to the Amended Complaint;

27 WHEREAS, in light of the newly added defendants, and in order to provide a uniform
28 schedule for responding to the Amended Complaint, which is in the interests of the Parties and

judicial economy, counsel for the Parties have met and conferred and agree that there is good cause to move the previously set deadline for the Company and Mr. Pascal to move answer, or otherwise respond to the Amended Complaint by a few weeks to coincide with a response date for the newly added defendants, as agreed and set forth below;

NOW THEREFORE, IT IS STIPULATED AND AGREED, subject to the Court's approval, that:

i. The deadline for all defendants to move, answer, or otherwise respond to the Amended Complaint is December 21, 2022;

ii. In the event that defendants move to dismiss the Amended Complaint, the parties shall meet and confer and thereafter submit to the Court a mutually agreeable schedule for further briefing on any such motion.

Dated: October 28, 2022

MUEHLBAUER LAW OFFICE, LTD.

By: /s/Andrew R. Muehlbauer
Andrew R. Muehlbauer

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Grove, William J. Hornbuckle, Joe Horowitz,
Jason Krikorian, and Judy K. Mencher*

IT IS SO ORDERED.


United States Magistrate Judge

DATED: October 31, 2022